

APR 16 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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April 16, 1993

HAND DELIVERY


Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Dear Ms. Searcy:

On behalf of Jules Cohen and Associates, P.C., transmitted herewith for filing with the Commission are an original and nine copies of its Reply Comments in ET Docket No. 92-298.

If there are any questions in connection with the foregoing, please contact the undersigned or Jules Cohen.

Sincerely yours,



Robert W. Denny, Jr., P.E.
President

Enclosures

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best possible. Selection of a particular system without regard to others which may be available could condemn AM broadcasting to continuing inferiority in aural broadcasting. Furthermore, the advance of technology since 1982 may permit the adoption of a system superior to any that were offered in the earlier stereo investigation.

3. As pointed out by Kahn¹, Hazeltine², Hershberger³ and CTI⁴, AM broadcasters have not demonstrated the "strong preference" for the C-Quam system attributed by the Commission. With little more than ten percent of AM broadcasters choosing C-Quam, despite a general belief that stereo broadcasting would benefit the industry, no evidence exists that broadcasters have endorsed that system as the answer to AM broadcasting's need for a stereo system good enough to compete with FM. On the contrary, refusal of the vast majority of broadcasters to add stereo via the C-Quam route appears to deliver the contrary message that the system is not good enough to justify conversion to stereo.

4. Weaknesses of the Motorola system including "platform motion", loss of coverage and increased interference documented by Kahn (pages 4 and 5) have been confirmed by observers, including the undersigned, not associated with any system proponent. Such undesirable features are not necessary concomitants of AM stereo broadcasting and should not be present in a system sanctioned by the Commission as the standard to be employed universally.

5. Cohen agrees with Capital Cities/ABC⁵ that: "The Commission has the responsibility to make an independent judgment that the stereo standard selected meets the public interest test." C-Quam, at least as now configured, does not meet that test. Either through the use of its own resources, or perhaps by enlisting the assistance of the National Institute for Science and Technology (NIST), an objective, analytic and experimental study of all systems whose

¹ Comments of Leonard R. Kahn, ET Docket N. 92-298, April 5, 1993, page 2 *et seq.*

² Comments of Hazeltine Corporation, ET Docket No. 92-298, Section 5.

³ Comments of David L. Hershberger, ET Docket No. 92-298, April 2, 1993, page 6.

⁴ Comments of Communications Technologies, Inc., ET Docket No. 92-298, March 31, 1993, para. 11.

⁵ Comments of Capital Cities/ABC, ET Docket No. 92-298, April 5, 1993, page 5.

proponents are willing to provide full descriptions and hardware should be undertaken for completion in the short time period contemplated by the Congressional action.

6. Only through an independent analysis by an entity, such as the FCC or NIST, whose objectivity cannot be challenged, and the preparation of a report setting forth the reasons for the superiority of a system, can AM broadcasters have the assurance that their interests are being well served. Such an effort would be a suitable companion to other initiatives by the Commission to improve and preserve AM broadcasting.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Jules Cohen".

Jules Cohen, P.E.
Consultant to the Firm

A handwritten signature in cursive script, appearing to read "Robert W. Denny, Jr.".

Robert W. Denny, Jr., P.E.
President

April 15, 1993

CERTIFICATE OF SERVICE

I, Florence M. Hendrickson, a secretary in the office of Jules Cohen & Associates, P.C., hereby certify that I have sent this day, by prepaid first class mail, copies of the foregoing Reply Comments in Response of Notice of Proposed Rule Making Regarding Adoption of Standard for AM Stereo Broadcasting on this date, April 16, 1993, to the following:

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